

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Case No. 22-33581
Joycare Therapy, LLC	§	
	§	
Debtor	§	Chapter 11

**DEBTOR'S MOTION FOR FINAL DECREE AND
ADMINISTRATIVE CLOSING OF CASE**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Joycare Therapy, LLC ("Debtor"), Debtor-in-possession, in the above bankruptcy case, and respectfully requests that this Court enter a Final Decree in the above-entitled case and close this case, pursuant to 11 U.S.C. § 350 and F.R.B.P. 3022 and would show this court as follows:

1. The Order confirming the Plan was entered on July 11, 2023.
2. All operating reports through July 2023 have been filed.
3. Debtor's counsel has filed a final fee application at docket #157.
4. Debtor's accountant has filed a final fee application at docket #159.
5. The subpart V trustee has filed a final fee application at docket #161.

6. The plan will be substantially consummated when the Class 5 Creditors are paid and the administrative expenses are paid.
7. All motions and contested matters have been resolved or will soon be resolved.
8. No amounts are owed to the U.S. Trustee.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that this court (1) grant Debtor's Motion for Final Decree, (2) order the case closed, and (3) for such other and further relief as to which Debtor may be justly entitled.

Dated: August 16, 2023

Respectfully submitted,

/s/ Reese W. Baker

Reese W. Baker.

Tx Bar No. 01587700

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on August 16, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Reese W. Baker

Reese W. Baker